

U.S. Department of Justice

Washington, DC 20530

Supplemental Statement**Pursuant to the Foreign Agents Registration Act of 1938, as amended**For 6 Month Period Ending 04/30/2021

(Insert date)

I - REGISTRANT

1. (a) Name of Registrant

OCP North America, Inc.

(b) Registration Number

6873

(c) Primary Business Address

1370 Sixth Avenue, 32nd Floor, New York City, NY 10019

2. Has there been a change in the information previously furnished in connection with the following?

(a) If an individual:

(1) Residence address(es) Yes ☐ No ☐(2) Citizenship Yes ☐ No ☐(3) Occupation Yes ☐ No ☐

(b) If an organization:

(1) Name Yes ☐ No ☒(2) Ownership or control Yes ☐ No ☒(3) Branch offices Yes ☐ No ☒

(c) Explain fully all changes, if any, indicated in Items (a) and (b) above.

IF THE REGISTRANT IS AN INDIVIDUAL, OMIT RESPONSES TO ITEMS 3, 4, 5, AND 6.3. If the registrant previously filed an Exhibit C¹, state whether any changes therein have occurred during this 6 month reporting period. Yes ☐ No ☒If yes, has the registrant filed an updated Exhibit C? Yes ☐ No ☐

If no, please file the updated Exhibit C.

¹ The Exhibit C, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, and by laws of a registrant that is an organization. (A waiver of the requirement to file an Exhibit C may be obtained for good cause upon written application to the Assistant Attorney General, National Security Division, U.S. Department of Justice, Washington, DC 20530.)

4. (a) Have any persons become partners, officers, directors or similar officials during this 6 month reporting period?

Yes ☒ No ☐

If yes, furnish the following information:

Name	Residence Address	Citizenship	Position	Date Assumed
See Appendix for Response				

(b) Have any persons ceased acting as partners, officers, directors or similar officials of the registrant during this 6 month reporting period?

Yes ☒ No ☐

If yes, furnish the following information:

Name	Position	Date Ceased
Mohamed Belhoussain	Director	04/08/2021
Ghislane Guedira	Director	04/08/2021

5. (a) Has any person named in Item 4(a) rendered services directly in furtherance of the interests of any foreign principal?

Yes ☒ No ☐

If yes, identify each such person and describe the service rendered.

Name	Foreign Principal(s) Represented	Services
See Appendix for Response		

(b) During this 6 month reporting period, has the registrant hired as employees or in any other capacity, any persons who rendered or will render services to the registrant directly in furtherance of the interests of any foreign principal(s) in other than a clerical or secretarial, or in a related or similar capacity? Yes ☒ No ☐

Name	Residence Address	Citizenship	Position	Date Assumed
Ali Mernissi		MOROCCO	Legal Counsel	11/05/2020

(c) Have any employees or individuals, who have filed a short form registration statement, terminated their employment or connection with the registrant during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

Name	Position or Connection	Date Terminated

(d) Have any employees or individuals, who have filed a short form registration statement, terminated their connection with any foreign principal during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

Name	Position or Connection	Foreign Principal	Date Terminated

6. Have short form registration statements been previously filed by all of the persons named in Items 5(a) and 5(b) of the supplemental statement or submitted with this filing? Yes ☒ No ☐

If no, list names of persons who have not previously filed the required statement or are not submitting a short form with this filing.

II - FOREIGN PRINCIPAL

7. Has the registrant's connection with any foreign principal(s) ended during this 6 month reporting period?

Yes ☐ No ☒

If yes, furnish the following information:

Foreign Principal

Date of Termination

8. Has the registrant added any new foreign principal(s)² during this 6 month reporting period?

Yes ☐ No ☒

If yes, furnish the following information:

Foreign Principal

Date Added

9. In addition to those named in Items 7 and 8, if any, list the foreign principal(s) whom the registrant continued to represent during the 6 month reporting period.

OCF S.A.

10. (a) Has the registrant filed Exhibits A and B for the newly added foreign principal(s), if any, listed in Item 8?

Exhibit A³ Yes ☐ No ☐ N/A ☒

Exhibit B⁴ Yes ☐ No ☐ N/A ☒

If no, please file the required exhibit.

(b) Have there been any changes in the Exhibits A and B previously filed for any foreign principal(s) whom the registrant represented during this 6 month period? Yes ☐ No ☒

If yes, has the registrant filed an amendment to these exhibits? Yes ☐ No ☐

If no, please file the required amendment.

² The term "foreign principal" includes, in addition to those defined in Section 1(b) of the Act, an individual organization any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual. (See Rule 100(a) (9)). A registrant who represents more than one foreign principal is required to list in the statements he files under the Act only those principals for whom he is not entitled to claim exemption under Section 3 of the Act. (See Rule 208.)

³ The Exhibit A, which is filed on Form NSD-3, sets forth the information required to be disclosed concerning each foreign principal.

⁴ The Exhibit B, which is filed on Form NSD-4, sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.

III - ACTIVITIES

11. During this 6 month reporting period, has the registrant engaged in any activities for or rendered any services to any foreign principal named in Items 7, 8, or 9 of this statement? Yes ☒ No ☐

If yes, identify each foreign principal and describe in full detail all activities and services:

Foreign Principal	Activities/Services
See Appendix for Response	

12. During this 6 month reporting period, has the registrant, on behalf of any foreign principal, engaged in political activity⁵ as defined below? Yes ☒ No ☐

If yes, identify each foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures, social media, internet postings, or media broadcasts, give details as to dates, places of delivery, names of speakers and subject matter. The response must include, but not be limited to, activities involving lobbying, promotion, perception management, public relations, economic development, and preparation and dissemination of informational materials.

Set forth below a general description of the registrant's political activities.

OCP S.A.: See response to item 11.

Set forth below in the required detail the registrant's political activities.

Foreign Principal	Date	Contact	Method	Purpose
See Appendix for Response				

13. In addition to the above described activities, if any, has the registrant engaged in activity or rendered any services on its own behalf which benefits the registrant's foreign principal(s)? Yes ☐ No ☒

If yes, describe fully.

Foreign Principal	Activities/Services

⁵ "Political activity," as defined in Section 1(o) of the Act, means any activity that the person engaging in believes will, or that the person intends to, in any way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting or changing the domestic or foreign policies of the United States or with reference to political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

14. (a) **RECEIPTS-MONIES**

If no, please explain why no monies were received.

\$	168,057.36
<hr/>	
	Total

If no, please file the required Exhibit D.

Foreign Principal	Date Received	From Whom	Purpose	Thing of Value
-------------------	---------------	-----------	---------	----------------

9 Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

15. (a) DISBURSEMENTS-MONIES

During this 6 month reporting period, has the registrant disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 7, 8, or 9 of this statement or transmitted monies to any such foreign principal? Yes ☒ No ☐

If no, explain why no disbursements were made.

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal.

Foreign Principal	Date	Recipient	Purpose	Amount	Subtotal
See Appendix for Response					

\$	665,823.97
<hr/>	
	Total

(b) DISBURSEMENTS-THINGS OF VALUE

During this 6 month reporting period, has the registrant disposed of anything of value¹⁰ other than money in furtherance of or in connection with activities on behalf of any foreign principal named in Items 7, 8, or 9 of this statement?

Yes ☐ No ☒

If yes, furnish the following information:

Foreign Principal	Date	Recipient	Purpose	Thing of Value
-------------------	------	-----------	---------	----------------

(c) DISBURSEMENTS-POLITICAL CONTRIBUTIONS

During this 6 month reporting period, has the registrant (or any short form registrant) from its own funds and on its own behalf either directly or through any other person, made any contributions of money or other things of value¹¹ in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office?

Yes ☐ No ☒

If yes, furnish the following information:

Date	Donor	Political Organization/Candidate	Method	Amount/Thing of Value
------	-------	----------------------------------	--------	-----------------------

10, 11 Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

V - INFORMATIONAL MATERIALS

16. (a) During this 6 month reporting period, has the registrant prepared, disseminated or caused to be disseminated any informational materials?¹² Yes ☒ No ☐

(b) If yes, identify each such foreign principal for which informational materials were disseminated and respond to the remaining items in this section.

OCP S.A.

17. During this 6 month reporting period, has a budget been established or specified sum of money allocated to finance the registrant's activities in preparing or disseminating informational materials? Yes ☐ No ☒

If yes, identify each such foreign principal, and specify the period of time and the amount.

Foreign Principal	Period of Time	Amount
-------------------	----------------	--------

18. During this 6 month reporting period, has the registrant's activities in preparing, disseminating or causing the dissemination of informational materials included the use of any of the following:

- | | | | |
|--|---|--|--|
| <input type="checkbox"/> Magazine or newspaper | <input type="checkbox"/> Advertising campaigns | <input checked="" type="checkbox"/> Press releases | <input type="checkbox"/> Pamphlets or other publications |
| <input type="checkbox"/> Lectures or speeches | <input type="checkbox"/> Radio or TV broadcasts | <input type="checkbox"/> Motion picture films | <input type="checkbox"/> Letters or telegrams |
| <input type="checkbox"/> Email | | | |

☒ Website URL(s): ocpna.com; https://www.standwithusfarmers.com/

☒ Social media websites URL(s): https://www.linkedin.com/company/ocpna

☐ Other (specify) _____

19. During this 6 month reporting period, has the registrant prepared, disseminated, or caused to be disseminated informational materials among any of the following groups:

- | | | |
|--|---|---|
| <input checked="" type="checkbox"/> Public officials | <input checked="" type="checkbox"/> Newspapers | <input type="checkbox"/> Libraries |
| <input checked="" type="checkbox"/> Legislators | <input type="checkbox"/> Editors | <input type="checkbox"/> Educational institutions |
| <input checked="" type="checkbox"/> Government agencies | <input type="checkbox"/> Civic groups or associations | <input type="checkbox"/> Nationality groups |
| <input checked="" type="checkbox"/> Other (specify) <u>See Appendix for Response</u> | | |

20. Indicate the language used in the informational materials:

- ☒ English ☐ Other (specify) _____

21. Has the registrant filed with the FARA Unit, U.S. Department of Justice a copy of each item of such informational materials prepared, disseminated or caused to be disseminated during this 6 month reporting period? Yes ☒ No ☐

If no, please please file the required informational materials.

22. Has the registrant labeled each item of such informational materials with the statement required by Section 4(b) of the Act?

Yes ☒ No ☐

12 The term informational materials includes any oral, visual, graphic, written, or pictorial information or matter of any kind, including that published by means of advertising, books, periodicals, newspapers, lectures, broadcasts, motion pictures, or any means or instrumentality of interstate or foreign commerce or otherwise. Informational materials disseminated by an agent of a foreign principal as part of an activity in itself exempt from registration, or an activity which by itself would not require registration, need not be filed pursuant to Section 4(b) of the Act.

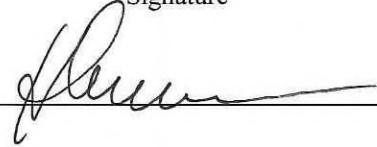
EXECUTION

In accordance with 28 U.S.C. § 1746, and subject to the penalties of 18 U.S.C. § 1001 and 22 U.S.C. § 618, the undersigned swears or affirms under penalty of perjury that he/she has read the information set forth in this statement filed pursuant to the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 *et seq.*, that he/she is familiar with the contents thereof, and that such contents are in their entirety true and accurate to the best of his/her knowledge and belief.

Date

Printed Name

Signature

5/30/21KERRY S. MCNAMARA

Appendix
Response to Item 4(a)

Item 4(a): Have any persons become partners, officers, directors or similar officials during this 6 month reporting period? If yes, furnish the following information:

Name	Residence Address	Citizenship	Position	Date Assumed
Bruce Wilson	Provided Separately to DOJ	UNITED STATES	Director	04/08/2021
Soufiyane El Kassi	Provided separately to DOJ. MOROCCO	MOROCCO	Chief Growth Officer	04/08/2021
Kenza Margaoui		MOROCCO	General Counsel	04/08/2021
Kenza Margaoui	Provided separately to DOJ. MOROCCO	MOROCCO	General Counsel	04/08/2021

Appendix
Response to Item 5(a)

Item 5(a): Has any person named in Item 4(a) rendered services directly in furtherance of the interests of any foreign principal? If yes, identify each such person and describe the service rendered.

Name	Foreign Principal(s) Represented	Services
Bruce Wilson	OCP S.A.	Development of legislative and executive department messaging and communication strategies, and, where appropriate, assist OCP's other advisors in developing communications and policy strategies related to OCP's role in the U.S. fertilizer sector and the potential impact of tariffs on the U.S. agricultural community.

Appendix

Response to Item 11

Item 11: During this 6 month reporting period, has the registrant engaged in any activities for or rendered any services to any foreign principal named in Items 7, 8, or 9 of this statement? If yes, identify each foreign principal and describe in full detail all activities and services:

Foreign Principal(s)	Activities/Services
OCP S.A.	<p>Registrant coordinated and directed a public relations campaign regarding countervailing duty investigations by the U.S. government into phosphate fertilizer imports, including: (1) developing and executing engagement strategy with customers of OCP N.A., trade groups, and other third parties regarding countervailing duty investigations by the U.S. government into phosphate fertilizer imports; (2) interacting with investigative bodies regarding countervailing duty investigations by the U.S. government into phosphate fertilizer imports; (3) U.S. government lobbying regarding countervailing duty investigations by the U.S. government into phosphate fertilizer imports; (4) management of media relations and communications with U.S. media representatives regarding countervailing duty investigations by the U.S. government into phosphate fertilizer imports; (5) developing and disseminating a press release to promote awareness and action in response to U.S. duties on imports of phosphate fertilizers; (6) creating and administering the www.StandwithUSFarmers.com website; and (7) managing subcontractors for the public relations campaign. OCP N.A. also engaged in non-registrable commercial activities for OCP S.A. during the reporting period.</p>

Appendix

Response to Item 12-Detail

Foreign Principal(s)	Date	Contact	Method	Purpose
OCP S.A.	11/12/2020	Jimmy Ballard and Janie Costa, Office of Rep. Rodney Davis	Video Call	Introduce OCP, discuss the CVD petition and the status of the case.
OCP S.A.	01/07/2021	Steve Davies, Reporter, Agri Pulse	Video Call	Interview for potential article on CVD.
OCP S.A.	01/13/2021	Amie Simpson, Brownfield (Ag radio network)	Video Call	Recorded Interview on CVD matter for potential/probable broadcast on their radio network.
OCP S.A.	01/26/2021	Margy Eckelkamp, Farm Journal	Telephone Call	Introduce OCP, discuss the CVD petition and the status of the case.
OCP S.A.	01/27/2021	Daniel Heady, Iowa Farm Bureau	Video Call	Introduce OCP, discuss the CVD petition and the status of the case.
OCP S.A.	11/18/2020	Nora Todd, Office of Senator Sherrod Brown	Video Call	Introduce OCP, discuss the CVD petition and the status of the case.
OCP S.A.	11/30/2020	Rep. Garrett Graves and Dustin Davidson, Office of Rep. Garrett Graves	Video Call	Introduce OCP, discuss the CVD petition and the status of the case.
OCP S.A.	12/09/2020	Daniel Ulmer, Office of Senator Cindy Hyde-Smith	Video Call	Introduce OCP, discuss the CVD petition and the status of the case.
OCP S.A.	12/17/2020	Yusuf Nekzad, Office of Rep. Cheri Bustos	Video Call	Introduce OCP, discuss the CVD petition and the status of the case.
OCP S.A.	11/18/2020	Katie Zenk, House Ag Committee Staff Majority	Video Call	Provide update on the CVD process.
OCP S.A.	11/18/2020	Janae Brady and Andrew Rezendes, Senate Agriculture Committee Staff Majority	Video Call	Introduce OCP, discuss the CVD petition and the status of the case.

Foreign Principal(s)	Date	Contact	Method	Purpose
OCP S.A.	11/20/2020	Ethan Holmes, Office of Rep. Ron Kind	Video Call	Introduce OCP, discuss the CVD petition and the status of the case.
OCP S.A.	11/20/2020	Keigan Mull, House Ways & Means Staff Majority	Video Call	Introduce OCP, discuss the CVD petition and the status of the case.
OCP S.A.	01/15/2021	Aaron Weber, Office of Senator John Hoeven (North Dakota)	Video Call	Introduce OCP, discuss the CVD petition and the status of the case.
OCP S.A.	02/02/2021	Rep. Randy Feenstra, Office of Rep. Randy Feenstra	Video Call	Introduce OCP, discuss the CVD petition and the status of the case.
OCP S.A.	04/29/2021	Pam Miller, Dudley Hoskins, Andrew Rezendes, Skylar Sowder, Peggy Browne, Mary Cromley	Video Call	Introduce OCP, discuss the CVD petition and the status of the case.
OCP S.A.	11/12/2020	MaryKate Carter and Andrew Brant and Rory Heslington	Video Call	Introduce OCP, discuss the CVD petition and the status of the case.

Appendix

Response to Item 14(a)-Detail

Foreign Principal(s)	Date Received	From Whom	Purpose	Amount	Subtotal
OCP S.A.	12/03/2020	OCP SA	OCPNA services related expenses or reimbursement for subcontractors.	\$13,220.10	
OCP S.A.	01/07/2021	OCP SA	OCPNA services related expenses or reimbursement for subcontractors.	\$145,606.25	
OCP S.A.	02/26/2021	OCP SA	OCPNA services related expenses or reimbursement for subcontractors.	\$ 9,231.00	
OCP S.A.	04/30/2021	None	As indicated in item 11, OCP N.A. also provides non-registerable commercial services for OCP S.A., and received monies related to those activities during the period.	\$.01	
OCP S.A.	-----	-----	-----	----->	\$168,057.36

Appendix

Response to Item 15(a)-Detail

Foreign Principal	Date	Recipient	Purpose	Amount	Subtotal
OCP S.A.	11/03/2020	Vox Global LLC	Digital Campaign services and Microsite development.	\$20,000.00	
OCP S.A.	11/27/2020	Cornerstone Government Affairs, Inc.	Communication and Public relations services.	\$25,000.00	
OCP S.A.	12/23/2020	Vox Global LLC	Digital Campaign services and Microsite development.	\$10,000.00	
OCP S.A.	12/30/2020	Fleishman Hillard Inc.	External campaign outreach, communicatin services and digital campaign analysis.	\$25,606.25	
OCP S.A.	12/30/2020	Fleishman Hillard Inc.	External campaign outreach, communicatin services and digital campaign analysis.	\$80,162.50	
OCP S.A.	01/11/2021	CCO Communications, LLC	Services related to public relations and corporate communication.	\$18,352.00	
OCP S.A.	01/11/2021	CCO Communications, LLC	Services related to public relations and corporate communication.	\$19,725.00	
OCP S.A.	01/11/2021	CCO Communications, LLC	Services related to public relations and corporate communication.	\$ 1,800.00	
OCP S.A.	01/11/2021	CCO Communications, LLC	Services related to public relations and corporate communication..	\$17,692.50	
OCP S.A.	01/11/2021	Cornerstone Government Affairs, Inc.	Communication and Public relations services.	\$25,000.00	
OCP S.A.	01/21/2021	Fleishman Hillard Inc.	External campaign outreach, communicatin services and digital campaign analysis.	\$60,337.50	
OCP S.A.	01/21/2021	Vox Global LLC	Digital Campaign services and Microsite development.	\$67,677.00	
OCP S.A.	01/28/2021	Vox Global LLC	Digital Campaign services and Microsite development.	\$45,072.00	
OCP S.A.	01/29/2021	Cornerstone Government Affairs, Inc.	Communication and Public relations services.	\$25,000.00	
OCP S.A.	02/08/2021	Fleishman Hillard Inc.	External campaign outreach, communicatin services and digital campaign analysis.	\$49,584.86	

Foreign Principal	Date	Recipient	Purpose	Amount	Subtotal
OCP S.A.	02/12/2021	Michael R Rahm Consulting LLC	Services in connection with the CVD investigation by the U.S. Department of Commerce and International Trade Commission into phosphate fertilizer imports from Morocco.	\$24,625.00	
OCP S.A.	02/22/2021	CCO Communications, LLC	Services related to public relations and corporate communication.	\$ 8,611.00	
OCP S.A.	03/04/2021	Vox Global LLC	Digital Campaign services and Microsite development.	\$ 3,028.10	
OCP S.A.	03/15/2021	CCO Communications, LLC	Services related to public relations and corporate communication.	\$11,144.00	
OCP S.A.	03/15/2021	CCO Communications, LLC	Services related to public relations and corporate communication.	\$ 4,950.00	
OCP S.A.	03/22/2021	Fleishman Hillard Inc.	External campaign outreach, communication services and digital campaign analysis.	\$73,956.25	
OCP S.A.	03/23/2021	Michael R Rahm Consulting LLC	Services in connection with the CVD investigation by the U.S. Department of Commerce and International Trade Commission into phosphate fertilizer imports from Morocco.	\$23,500.00	
OCP S.A.	04/21/2021	Cornerstone Government Affairs, Inc.	Communication and Public relations services.	\$25,000.00	
OCP S.A.	04/30/2021	None.	As indicated in item 11, OCP N.A. also provides non-registerable commercial services for OCP S.A., and made disbursements related to those activities during the period.	\$.01	
OCP S.A.	-----	-----	-----	----->	\$665,823.97

Appendix
Response to Item 19(j)

Item 19(j): During this 6 month reporting period, has the registrant prepared, disseminated, or caused to be disseminated informational materials among any of the following groups: Other (specify).

Fertilizer and agricultural industries, including trade associations